issues of right. *Farquharson* v. *Morgan*, [1894] 1 Q. B. 552; *Worthington* v. *Jeffries*, L. R. 10 C. P. 239, 280; *Chambers* v. *Green*, L. R. 20 Eq. 552, 555. Logically prohibition is the exact counterpart of mandamus. See *Thomas* v. *Mead*, 36 Mo. 232, 247. The latter is invoked to compel exercise of jurisdiction by an inferior court; the former, to prohibit a threatened usurpation or abuse of jurisdiction. *In the Matter of Turner*, 5 Oh. 542; *Connecticut River R. Co.* v. *County Commissioners of Franklin*, 127 Mass. 50. Mandamus, like prohibition, originated as a royal prerogative issuing at the discretion of the king in the exercise of his police powers. See *Awdley* v. *Joy*, Poph. 176; *King* v. *Barker*, 1 W. Bl. 351; 3 Bl. Comm. 111. The obvious repugnance of this conception to our form of government has led the majority of American courts to treat mandamus as issuing of right, and hence as subject to review. *Hartman* v. *Greenhow*, 102 U. S. 672; *Gilman* v. *Bassett*, 33 Conn. 298. By applying the same reasoning to prohibition, the writ should issue of right, even when as in the principal case an inadequate legal remedy is also available.

RESTRAINT OF TRADE — SHERMAN ANTI-TRUST LAW — COMBINATION OF COMPETING RAILROADS. — The Union Pacific Railroad Company bought a controlling interest in the stock of the Southern Pacific Company. The two railroads did a large amount of competitive business, though such business was but a small part of all the traffic carried by them. *Held*, that the transaction constitutes a combination in restraint of trade under the Sherman Anti-Trust Law. *United States* v. *Union Pacific R. Co.*, 226 U. S. 61, 33 Sup. Ct. 53.

The Standard Oil case, holding that only undue restraints of trade are forbidden by the Sherman Anti-Trust Law, intimated that that combination might have been lawful had it not been for the unfair methods used in crushing competitors. *Standard Oil Co.* v. *United States*, 221 U. S. 1, 31 Sup. Ct. 502. See 25 HARV. L. REV. 31. Before that decision a combination of competing railroads was clearly regarded as within the act. *United States* v. *Trans-Missouri Freight Association*, 166 U. S. 290, 17 Sup. Ct. 540; *United States* v. *Joint Traffic Association*, 171 U. S. 505, 19 Sup. Ct. 25; *Northern Securities Co.* v. *United States*, 193 U. S. 197, 24 Sup. Ct. 436. The merger of competing railroads was considered inimical to the public welfare because of their public nature and practical monopoly. See *Northern Securities Co.* v. *United States*, 193 U. S. 197, 363, 24 Sup. Ct. 436, 467; *Louisville & Nashville R. Co.* v. *Kentucky*, 161 U. S. 677, 697, 698, 16 Sup. Ct. 714, 722. The principal case affirms the principle that the suppression of outside competitors is not essential to constitute undue restraint of trade in such a case, whatever may be the rule in regard to industrial combinations. See 25 HARV. L. REV. 71. The case further holds that even though the competitive business constitutes but a small portion of the total business transacted, if its amount is considerable the entire combination is illegal. The result shows, also, consistently with the "rule of reason" adopted in the Standard Oil case, that the form of the transaction producing the undue restraint is immaterial. *United States* v. *American Tobacco Co.*, 221 U. S. 106, 31 Sup. Ct. 632. Conceding the undue restraint, the purchase by one company of a controlling interest in the stock of a competitor is a "combination" within the act. *United States* v. *Terminal R. Association of St. Louis*, 224 U. S. 383, 32 Sup. Ct. 507.

RESTRAINT OF TRADE — SHERMAN ANTI-TRUST LAW — CONTROL OF COAL MARKET BY CONTRACTS TO PURCHASE OUTPUT OF COMPETITORS. — The six defendant carriers controlled the means of transportation from the district in which is located all the anthracite coal of the country. The proposed building of a new railroad into the district was defeated by the carriers' taking the stock in a new company formed by them to purchase the coal property from